



**MEMORANDUM FOR EMILY MURPHY  
ADMINISTRATOR (A)**

**FROM:** ALLISON BRIGATI (b) (6)  
DEPUTY ADMINISTRATOR (AD)

**SUBJECT:** Recusal Notification

This memorandum provides you with written notification of my recusal obligations. As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter that has a direct and predictable effect on my financial interests or those of any person whose interests are imputed to me, unless I first obtain a written waiver pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: my spouse or minor child; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

Further, under the Impartiality in the Performance of Official Duties regulation 5 C.F.R. § 2635.502(a), I will not work on a particular matter involving a specific party or parties which can affect someone with whom I have a covered relationship. Under this provision, I have a covered relationship with my spouse's employers, and thus I am prohibited from working on matters where my spouse's employers' are a party, or represents a party in the matter, unless I receive prior written authorization from my immediate supervisor pursuant to 5 C.F.R. § 2635.502(d).

My spouse is either employed by or works as an independent contractor for the companies listed in Attachment 1. As such, I will not participate personally and substantially in any particular matters that may have a direct and predictable effect on the financial interests in the listed companies, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or I qualify for a regulatory exemption pursuant to 18 U.S.C. § 208(b)(2), or am authorized under 5 C.F.R. § 2635.502(d) based upon the applicable statute or regulation.

Actions that may constitute personal and substantial participation include assigning matters on an ad hoc basis; participating in a decision concerning who should work on a

U.S. General Services Administration  
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Washington, DC 20405

[www.gsa.gov](http://www.gsa.gov)

matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of the matter is considered personal and substantial participation.

To ensure that I do not inadvertently participate personally and substantially in such matters involving the entities identified in the attachment, all such matters should be referred to Jonathan Clinton, Senior Advisor to the Deputy Administrator. This person will handle all matters involving my spouse's employer and clients and advise all interested parties of the recusal. If you would prefer to select someone else to handle such matters, please notify me of your determination so that I can provide the appropriate information to my subordinates and colleagues, if appropriate.

I note that this is a fluid document and companies may be removed or added at any time. I will promptly make any necessary updates as needed. Additionally, while my recusal under the Ethics Pledge (Attachment 2) will remain in effect for two years from the date of my appointment, the recusal related to my spouse's employers and clients remains in effect indefinitely.

Attachment 1: List of Clients (spouse)

Attachment 2: Ethics Pledge Recusal

cc: Ethics Law Staff

## **ATTACHMENT 1: LIST OF CLIENTS**

1. TaaSera, Inc.
2. Elastic
3. Secure Government Technologies
4. MAD Security
5. FCN aka FCN, Inc.
6. Exabeam
7. Carahsoft
8. Splunk
9. Palo Alto Networks
10. Insight Engines
11. Foxit
12. McAfee
13. Corelight
14. Phantom Cyber
15. Attivo Networks
16. Okta
17. IronNet
18. Secureonix
19. Cisco
20. RSA
21. Zscaler
22. Cylance
23. CrowdStrike
24. Digital Guardian
25. VMWare
26. Equinix
27. ArmorText
28. IronVine Security



MEMORANDUM FOR ALAN THOMAS  
COMMISSIONER, FEDERAL ACQUISITION  
SERVICE (Q)

FROM: JOANNE COLLINS-SMEE  
DEPUTY COMMISSIONER  
AND DIRECTOR OF TECHNOLOGY  
TRANSFORMATION SERVICES (Q2)

SUBJECT: Recusal Notification

This memorandum provides you with written notification of my recusal obligations. As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter that has a direct and predictable effect on my financial interests or those of any person whose interests are imputed to me, unless I first obtain a written waiver pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: my spouse or minor child; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

I have a financial interest in the International Business Machines (IBM). As a result, I will not participate personally and substantially in any particular matter that has a direct and predictable effect on my financial interests in IBM, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

Actions that may constitute personal and substantial participation include assigning matters on an ad hoc basis; participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of the matter is considered personal and substantial participation.

Additionally, as required by paragraph 6 of the Ethics Pledge, I will not, for a period of two years from the date of my appointment of September 18, 2017, participate personally and substantially in any particular matter involving specific parties that is directly and substantially related to my former employer, IBM.

To ensure that I do not inadvertently participate officially in such matters involving the companies identified above, please identify who should handle matters involving the above entitled companies that would normally come before me. This person will handle all matters involving the above entitled companies and advise all interested parties of the recusal.

cc: Ethics Law Staff

(b) (6)



3/27/18



MEMORANDUM FOR ALLISON BRIGATI  
DEPUTY ADMINISTRATOR (AD)  
OFFICE OF THE ADMINISTRATOR

e-Signed by Michael Copeland  
on 2018-07-11

FROM: MICHAEL COPELAND  
REGIONAL ADMINISTRATOR (6A)

SUBJECT: Recusal Notification

As required by paragraph 6 of the Ethics Pledge, I will not, for a period of two years from the date of my appointment of January 8, 2018, participate personally and substantially in any particular matter involving specific parties that is directly and substantially related to my former employer or former clients. My former employer is the Bank of Blue Valley. Also, I currently hold nonpartisan office as Mayor of the City of Olathe. I may not represent the City on any matters before the Federal Government.

Actions that may constitute personal and substantial participation include assigning matters on an ad hoc basis; participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of the matter is considered personal and substantial participation.

I have been apprised of my Hatch Act obligations as well as the outside earned income limitations since the Mayor position is a compensated position.

To ensure that I do not inadvertently participate personally and substantially in such matters involving the entities for which I have a financial interest, all such matters should be referred to Dennis O'Connell. This person will handle all matters involving my former employer and clients and advise all interested parties of the recusal. If you would prefer to select someone else to handle such matters, please notify me of your determination so that I can provide the appropriate information to my subordinates and colleagues, if appropriate.

cc: Ethics Law Staff



MEMORANDUM FOR MICHAEL COPELAND  
REGIONAL ADMINISTRATOR (6A)  
OFFICE OF THE REGIONAL ADMINISTRATOR

(b) (6)

FROM: JUDITH DUNGAN  
SENIOR ADVISOR TO THE REGIONAL  
ADMINISTRATOR, R6 (6A)

SUBJECT: Recusal Notification

As required by paragraph 6 of the Ethics Pledge, I will not, for a period of two years from the date of my appointment of February 20, 2018, participate personally and substantially in any particular matter involving specific parties that is directly and substantially related to my former employer or former clients. Further, because I was a registered lobbyist within the two years before the date of my appointment, in addition to abiding by the limitations of paragraph 6 of the Ethics Pledge, I will not for a period of two years after the date of my appointment participate in any particular matter on which I lobbied within the two years before the date of my appointment or participate in the specific issue area in which that particular matter fits. My former employers are VOYCE, Beyond Housing, and the Missouri Children's Leadership Council.

Actions that may constitute personal and substantial participation include assigning matters on an ad hoc basis; participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of the matter is considered personal and substantial participation.

To ensure that I do not inadvertently participate personally and substantially in such matters involving the entities identified in the attachment, all such matters should be referred to Dennis O'Connel, Regional Counsel. This person will handle all matters involving my former employer and clients and advise all interested parties of the recusal. If you would prefer to select someone else to handle such matters, please notify me of your determination so that I can provide the appropriate information to my subordinates and colleagues, if appropriate.

Attachment

cc: Ethics Law Staff



MEMORANDUM FOR ALLISON BRIGATI  
DEPUTY ADMINISTRATOR (AD)  
OFFICE OF THE ADMINISTRATOR

FROM: ROBERT BABCOCK  
REGIONAL ADMINISTRATOR (7A)

(b) (6)

SUBJECT: Recusal Notification

As required by paragraph 6 of the Ethics Pledge, I will not, for a period of two years from the date of my appointment of January 8, 2018, participate personally and substantially in any particular matter involving specific parties that is directly and substantially related to my former employer or former clients. Further, because I was a registered lobbyist within the two years before the date of my appointment, in addition to abiding by the limitations of paragraph 6 of the Ethics Pledge, I will not for a period of two years after the date of my appointment participate in any particular matter on which I lobbied within the two years before the date of my appointment or participate in the specific issue area in which that particular matter fits. My former employer is Van Scoyoc Associates. My former clients are listed in the attachment.

Actions that may constitute personal and substantial participation include assigning matters on an ad hoc basis; participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of the matter is considered personal and substantial participation.

To ensure that I do not inadvertently participate personally and substantially in such matters involving the entities identified in the attachment, all such matters should be referred to Mark Duffy, GSA Acting Regional Counsel, Greater Southwest Region. This person will handle all matters involving my former employer and clients and advise all interested parties of the recusal. If you would prefer to select someone else to handle such matters, please notify me of your determination so that I can provide the appropriate information to my subordinates and colleagues, if appropriate.

Attachment

cc: Ethics Law Staff

**LIST OF CLIENTS**

Employer: Van Scoyoc Associates (employer)

Client: Alabama State Port Authority

Client: Austal USA

Client: Baldwin County Commission

Client: City of Gulf Shores

Client: City of Orange Beach

Client: FedEx Corporation

Client: Memphis-Shelby County Airport Authority

Client: Mobile County Commission

Client: Southern Company Services Inc.

Client: Travelers Companies Inc & Subsidiaries

Client: Union Pacific

Client: Mobile Airport Authority

Client: University of Alabama System

Client: City of Gadsden

Client: American Hotel & Lodging Association

Client: Arotech Corporation

Client: MacAndrews & Forbes Group LLC

Client: First Horizon National Corporation

Client: Lockheed Martin Corporation

Client: Alabama Association for Higher Education

Client: UAB Health System



MEMORANDUM FOR ALLISON BRIGATI  
DEPUTY ADMINISTRATOR (AD)  
OFFICE OF THE ADMINISTRATOR

(b) (6)

FROM: SCOTT ANDERSON  
REGIONAL ADVISOR, NCR (WA)

SUBJECT: Recusal Notification

As required by paragraph 6 of the Ethics Pledge, I will not, for a period of two years from the date of my appointment of January 2, 2018, participate personally and substantially in any particular matter involving specific parties that is directly and substantially related to my former employer or former clients. My former employer is the George Washington University.

Actions that may constitute personal and substantial participation include assigning matters on an ad hoc basis; participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of the matter is considered personal and substantial participation.

To ensure that I do not inadvertently participate personally and substantially in such matters involving the entities for which I have a financial interest, all such matters should be referred to Mr. Darren Blue, NCR PBS Regional Commissioner. This person will handle all matters involving my former employer and clients and advise all interested parties of the recusal. If you would prefer to select someone else to handle such matters, please notify me of your determination so that I can provide the appropriate information to my subordinates and colleagues, if appropriate.

cc: Ethics Law Staff



MEMORANDUM FOR ALLISON BRIGATI  
DEPUTY ADMINISTRATOR (AD)  
OFFICE OF THE ADMINISTRATOR

FROM:

BRIAN STERN  
REGIONAL ADMINISTRATOR (4A)

(b) (6)

7-18-18

SUBJECT:

Recusal Notification

As required by paragraph 6 of the Ethics Pledge, I will not, for a period of two years from the date of my appointment of February 20, 2018, participate personally and substantially in any particular matter involving specific parties that is directly and substantially related to my former employer or former clients. My former employer is Ben Stern Construction. The list of LLC's and LP's I am a member of are listed in the attachment.

Actions that may constitute personal and substantial participation include assigning matters on an ad hoc basis; participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of the matter is considered personal and substantial participation.

To ensure that I do not inadvertently participate personally and substantially in such matters involving the entities for which I have a financial interest, all such matters should be referred to Liana Henry, Regional Counsel. This person will handle all matters involving my former employer and clients and advise all interested parties of the recusal. If you would prefer to select someone else to handle such matters, please notify me of your determination so that I can provide the appropriate information to my subordinates and colleagues, if appropriate.

Attachment

cc: Ethics Law Staff

## **FORMER EMPLOYER AND LLC'S/LP's**

Ben Stern Construction – Former Employer

Stern Realty Partnership II, LP

Jefferson Highway LLC

Stern Market Properties, LLC

SQ Investments, LLC

8865 Siegen Lane LLC